

Andre J. Lachance  
Senior Counsel  
Andy.Lachance@VerizonWireless.com  
202-589-3775



Verizon Wireless  
1300 I Street, N.W.  
Suite 400 West  
Washington, DC 20005

Phone 202 589-3740  
Fax 202 589-3750

September 4, 2007

**Ex Parte**

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

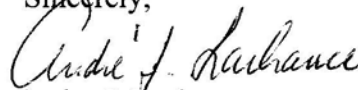
Re: *Notice of Ex Parte Presentation*  
EB Docket No. 06-119; WC Docket No. 06-63

Dear Ms. Dortch:

On Friday, August 31, 2007, Richard Craig, Director, Engineering and Operations Support and the undersigned met with Lisa Fowlkes, Deputy Bureau Chief, Public Safety and Homeland Security Bureau and Jeffery Goldthorp, Chief, Communications Systems Analysis Division, Public Safety and Homeland Security Bureau, to discuss matters in the above referenced proceeding. In particular, Verizon Wireless discussed issues concerning back-up power supplies at cell sites as set forth in the attachment to this letter.

Pursuant to Section 1.1206(b) of the Commission's rules, an electronic copy of this letter and attachments are being filed for inclusion in the above-referenced docket. Please direct any questions regarding this filing to the undersigned.

Sincerely,

  
Andre J. Lachance

Attachment

**VERIZON WIRELESS BACK-UP POWER PRESENTATION**  
**EB DOCKET NO. 06-119; WC DOCKET NO. 06-63**  
**AUGUST 31, 2007**

- Verizon Wireless applauds the FCC's decision to extend the effective date of the Commission's back-up power requirements in new rule section 12.2 to allow the Commission and the industry more time to consider adopting a more workable back-up power standard.
- Verizon Wireless is willing to work with FCC staff to craft a back-up power standard that provides the Commission with the assurances it seeks and the carriers with the flexibility they need.
- Verizon Wireless' internal design standard is for 8 hours or more of back-up power available at every cell site, where possible. That back-up power supply can be from generators, batteries or both.
- Verizon Wireless operates over 26,000 cell sites throughout the United States. The majority of all of these cell sites have on-site generators capable of providing back-up power for much longer than 8 hours and/or batteries designed to last longer than 8 hours. Only a small percentage of sites have only batteries that will not last for 8 hours, and only a handful have no on-site backup power at all.
- Installing back-up power at cell site locations presents many challenges that prevent Verizon Wireless from having 8 hours of back-up power at every site:
  - Most cell sites are located on leased property and the terms of the lease agreements often limits the type and amount of equipment Verizon Wireless can place on the property.
  - Many sites are located in buildings or on property where space is extremely limited or structural loading issues exist.
  - State and local regulatory restrictions such as zoning, building code, historic preservation, air quality and noise abatement can impact the feasibility of placing back-up power systems at a given site, limit the size of those systems or substantially delay their permitting and installation.
- Where factors dictate that Verizon Wireless rely on batteries alone to provide back-up power, battery life issues will influence Verizon Wireless' ability to meet its 8 hour design standard.
  - Battery reserve time is a function of the capacity of the battery plant (which may be limited due to space/loading restrictions), the age of the plant, the environmental conditions in which they operate (they can fail or provide less power due to excessive heat) and the traffic being carried on the cell site at a given moment (the greater the traffic, the lower the capacity).
  - Since batteries begin to deteriorate the minute they are installed, Verizon Wireless has methods and procedures in place that insure that batteries are regularly checked and replaced when they deteriorate, however, Verizon Wireless cannot guarantee that every battery designed to provide 8 hours of back-up power will actually do so.
- The factors listed above prevent Verizon Wireless from being able to meet the inflexible 8 hour back-up power requirement in the new regulation as written at

every cell site. Because these factors are mostly beyond Verizon Wireless' control, Verizon Wireless will never be able to meet an 8 hour back-up power requirement at most of the sites that currently do not meet an 8 hour standard, even if given more time to comply.

- Even where these factors do not prevent compliance with an inflexible 8 hour back-up power requirement, bringing sites into compliance will be challenging due to concerns about adequate supplies of back-up power sources, cost, and delays associated with getting the necessary permits or approvals.